

1 ANTHONY L. MARTIN
Nevada Bar No. 8177
2 anthony.martin@ogletreedeakins.com
ERICA J. CHEE
3 Nevada Bar No. 12238
erica.chee@ogletreedeakins.com
4 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
5 Wells Fargo Tower
Suite 1500
6 3800 Howard Hughes Parkway
Las Vegas, NV 89169
7 Telephone: 702.369.6800
8 Fax: 702.369.6888
9 *Attorneys for Plaintiff*
BrandSafway Services, LLC

10 UNITED STATES DISTRICT COURT
11
12 FOR THE DISTRICT OF NEVADA

13 BRANDSAFWAY SERVICES, LLC,

14 Plaintiff,

15 vs.

16 LABORERS INTERNATIONAL UNION
OF NORTH AMERICA, LOCAL 169,

17 Defendants.
18

Case No.: 3:20-cv-00362-MMD-CLB

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF'S
TO FILE OPPOSITION TO DEFENDANT'S
MOTION TO STAY AND MOTION TO
COMPEL ARBITRATION**

(First Request)

19 Pursuant to Rules LR IA 6-1, LR IA, 6-2, LR 7-1 and LR 7-2, Plaintiff BrandSafway
20 Services, LLC ("Plaintiff") and Defendant Laborers International Union of North America, Local
21 169 ("Defendant") by and through their respective undersigned counsel, hereby stipulate and agree
22 to their first request for a two-week extension of time, up to and including, **Thursday, September**
23 **10, 2020** for Plaintiff to respond to Defendant's Motion to Compel Arbitration (ECF No. 7) and
24 Motion to Stay the Case (ECF No. 8). The response to both motions are currently due Thursday,
25 August 27, 2020.

26 Good cause exists to extend the deadline for Plaintiff to file the opposition. Plaintiff's
27 counsel was in depositions on another matter the week of August 17 and Plaintiff's representative
28 with knowledge on the factual background of this matter was out of the office until the week of

1 August 24. As such, the parties stipulate to a two-week extension to afford Plaintiff additional time
2 to respond.

3 The stipulation is made in good faith and not for purposes of delay.

4
5 DATED this 24th day of August, 2020.

DATED this 24th day of August, 2020.

6 LAW OFFICES OF MICHAEL E. LANGTON

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

7 /s/ Michael E. Langton

/s/ Erica J. Chee

8 Michael E. Langton
9 Nevada Bar No. 290
801 Riverside Drive
10 Reno, NV 89503
11 *Attorney for Defendant*

Anthony L. Martin
Nevada Bar No. 8177
Erica J. Chee
Nevada Bar No. 12238
Wells Fargo Tower
Suite 1500
3800 Howard Hughes Parkway
Las Vegas, NV 89169
Attorneys for Plaintiff

12
13
14
15 **ORDER**

16 **IT IS SO ORDERED.**

17
18 

19 UNITED STATES DISTRICT JUDGE

20 August 24, 2020

21 DATED